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9 Sandstone Group, LLC, Ognen Stojanovski, and  
10 Brent Schwarz

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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

In re  
ANTHONY SCOTT LEVANDOWSKI,  
Debtor.

ANTHONY SCOTT LEVANDOWSKI,  
Plaintiff,  
v.  
UBER TECHNOLOGIES, INC.,  
Defendant.

Case No. 20-30242 HLB  
Chapter 11  
Adv No. 20-3050 HLB

**DECLARATION BY ADRIAN SAWYER  
IN SUPPORT OF ANTHONY  
LEVANDOWSKI'S ADMINISTRATIVE  
MOTION TO FILE REDACTED  
OPPOSITION TO UBER'S MOTION AND  
TO FILE UNREDACTED OPPOSITION  
AND SELECT EXHIBITS UNDER SEAL**

Hon. Hannah L. Blumenstiel

## **DECLARATION OF ADRIAN SAWYER**

I, Adrian Sawyer, hereby declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Sawyer & Labar LLP, attorneys of record for Non-Parties Tyto LiDAR, LLC, Sandstone Group, LLC, Ognen Stojanovski, and Brent Schwarz. I have personal knowledge of the matters stated in this declaration and could and would testify competently to the matters stated herein if called to do so.

8       2. I make this declaration pursuant to Local Rule 79-5, in support of Anthony  
9 Levandowski's Administrative Motion to File Redacted Opposition to Uber's Motion and to File  
10 Unredacted Opposition and Select Exhibits Under Seal (Dkt. No. 269.)

11       3.     Specifically, I make this declaration in support of sealing a portion of Exhibit 7 to  
12 Levandowski's Opposition to Uber's Motion to Strike, or in the Alternative, Motion in Limine to  
13 Exclude Expert Report and Testimony of Benjamin Rose and Joseph Shaw. Exhibit 7 is Uber  
14 Technology's Supplemental Responses to Anthony Levandowski's First Set of Interrogatories.

15       4. At page 8, lines 7 to 14, Exhibit 7 quotes and closely paraphrases the Arbitration  
16 Award in the underlying arbitration by Google against Levandowski. The Court has previously  
17 recognized my clients' interests in the confidentiality of the Award, has previously ordered it  
18 sealed, and has stated it will seal portions of the record discussing the Arbitration Award. *See*  
19 March 24, 2021 Fifth Order Regarding Discovery Dispute at 5:3-6 & n.4.

20       5.     Allowing the text at page 8, lines 7-14, of Exhibit 7 to be filed under seal is  
21 consistent with the Court's previous rulings regarding the substance of the Award, and the non-  
22 parties I represent respectfully request that the Court permit it to be sealed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 19th day of April 2021, at San Francisco, California.

s/ Adrian Sawyer

Adrian Sawyer

**CERTIFICATE OF SERVICE**

I, Sarah Guzman, hereby certify that on this 19th day of April, 2021, a copy of the foregoing **DECLARATION BY ADRIAN SAWYER IN SUPPORT OF ANTHONY LEVANDOWSKI'S ADMINISTRATIVE MOTION TO FILE REDACTED OPPOSITION TO UBER'S MOTION AND TO FILE UNREDACTED OPPOSITION AND SELECT EXHIBITS UNDER SEAL** was served via email, on the following:

<p><b>MUNGER, TOLLES &amp; OLSON LLP</b></p> <p>Thomas B. Walper (<a href="mailto:thomas.walper@mto.com">thomas.walper@mto.com</a>)</p> <p>John W. Berry (<a href="mailto:john.berry@mto.com">john.berry@mto.com</a>)</p> <p>Alexander S. Gorin (<a href="mailto:alex.gorin@mto.com">alex.gorin@mto.com</a>)</p> <p><b>KEKER, VAN NEST &amp; PETERS LLC</b></p> <p>Rachael E. Meny (<a href="mailto:rmeny@keker.com">rmeny@keker.com</a>)</p> <p>Thomas E. Gorman (<a href="mailto:tgorman@keker.com">tgorman@keker.com</a>)</p> <p>Reid P. Mullen (<a href="mailto:rmullen@keker.com">rmullen@keker.com</a>)</p>	<p><b>KELLER BENVENUTTI KIM LLP</b></p> <p>Tobias S. Keller (<a href="mailto:tkeller@kbkllp.com">tkeller@kbkllp.com</a>)</p> <p>Dara L. Silveira (<a href="mailto:dsilveira@kbkllp.com">dsilveira@kbkllp.com</a>)</p> <p><b>GOODWIN PROCTER LLP</b></p> <p>Brett Schuman (<a href="mailto:bschuman@goodwinlaw.com">bschuman@goodwinlaw.com</a>)</p> <p>Rachel M. Walsh (<a href="mailto:rwalsh@goodwinlaw.com">rwalsh@goodwinlaw.com</a>)</p> <p>Hong-An Vu (<a href="mailto:hvu@goodwinlaw.com">hvu@goodwinlaw.com</a>)</p>
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<p>Attorneys for Uber Technologies</p>	

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on April 19, 2021, at Sausalito, California.

Sarah Seymour